

1 LEIGH GODDARD, NV Bar #6315
JESSICA WOELFEL, NV Bar #11885
2 McDonald Carano Wilson LLP
100 West Liberty Street, 10th Floor
3 P.O. Box 2670
Reno, NV 89505-2670
4 Telephone: (775) 788-2000
Facsimile: (775) 788-2020
5 Email: lgoddard@mcdonaldcarano.com
and jwoelfel@mcdonaldcarano.com
6

7 *Attorneys for Plaintiff / Counter-Defendant*
8 *Nevada Controls, LLC*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 * * *

12 NEVADA CONTROLS, LLC, a Nevada
Limited Liability Company,

Case No.: 3:12-cv-00068-HDM-VPC

13 Plaintiff,

14 v.

**PLAINTIFF'S OPPOSITION TO
SUNFLOWER WIND'S MOTION
FOR EXTENSION OF TIME**

15 WIND PUMP POWER, LLC, a Kansas
16 Limited Liability Company, SUNFLOWER
WIND, LLC, a Kansas Limited Liability
17 Company; DAN RASURE, an individual,

18 Defendants.
19 _____ /

20 Defendant Sunflower Wind, LLC has filed a Motion for Extension of Time to
21 oppose Plaintiff Nevada Controls, LLC ("Nevada Controls") second motion to compel.
22 (Doc. #62). Concurrent with the Motion for Extension, Sunflower Wind filed a Motion
23 for its counsel to withdraw. (Doc. #60). Sunflower Wind suggests that it should be
24 permitted additional time to respond to the Motion to Compel so that it can retain new
25 counsel. (See Doc. #62).

26 Plaintiff Nevada Controls has filed an opposition to the Motion to Withdraw as
27 counsel, in which it identifies the numerous delays already experienced in this case as
28 a result of Sunflower Wind's dilatory conduct. For the reasons identified in the

1 Opposition to the Motion to Withdraw, which are incorporated herein by reference,
2 Nevada Controls similarly opposes the Motion for Extension of Time to respond to the
3 Motion to Compel. Nevada Controls has already been prejudiced by the Defendants'
4 repeated delays in this case. Accordingly, Nevada Controls hereby opposes the
5 Motion for an Extension of Time and respectfully submits that the Motion should be
6 denied.

7 Dated: May 20, 2013.

8 McDonald Carano Wilson LLP

9
10 

11 LEIGH GODDARD
12 JESSICA WOELFEL

13 Attorneys for Plaintiff / Counter-Defendant
14 Nevada Controls, LLC
15
16
17
18
19
20
21
22
23
24
25
26
27
28

McDONALD-CARANO-WILSON³

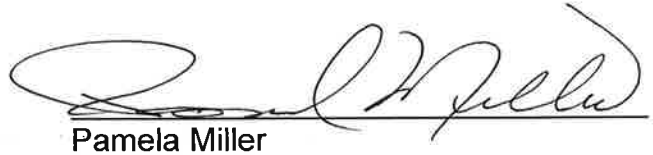
100 WEST LIBERTY STREET, 10TH FLOOR • RENO, NEVADA 89501
P.O. BOX 2670 • RENO, NEVADA 89505-2670
PHONE 775-788-2000 • FAX 775-788-2020

CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that I am an employee of McDonald Carano Wilson^{LLP} and that pursuant to LR 5-3 I caused to be electronically filed on this date a true and correct copy of the foregoing document with the Clerk of the Court using the CM/ECF system, addressed to:

Mark Goodman
Goodman Law Center, P.C.
348 Mill Street
Reno, NV 89501
mark@goodmanlawnevada.com

DATED: May 20, 2013.



Pamela Miller